

December 28, 1976

TO: All Commissioners and Alternates
FROM: Charles R. Roberts, Executive Director

INSTITUTE OF GOVERNMENTAL
STUDIES LIBRARY

SUBJECT: COMMISSION CONFLICT OF INTEREST CODE
(For Commission consideration on January 6, 1977)

DEC 29 1976

UNIVERSITY OF CALIFORNIA

Summary

Under the Fair Political Practices Act (Proposition 9), the Commission is required to adopt and promulgate a conflict of interest code. To meet the requirements of the Act, the staff is enclosing the following attached material for Commission consideration: (1) a draft code developed for the Commission by the Attorney General and the staff; (2) a draft instruction manual prepared by the Fair Political Practices Commission (FPPC); and (3) proposed forms for "statements of economic interests" (disclosure statements).

Legal Requirements

The Act requires that:

1. No "member, officer, employee, or consultant of a state...agency" "shall make, participate in making or in any way attempt to use his official position to influence a governmental decision in which he knows or has reason to know he has a financial interest."
2. The Commission shall "adopt and promulgate a Conflict of Interest Code pursuant to the provisions of...[Proposition 9]." The Code must include (a) a specific enumeration of the positions within the agency which involve the making of or participation in the making of decisions which may foreseeably have a material effect on any financial interest; (b) requirements that designated employees file disclosure statements; and (c) specific provisions setting forth any circumstances under which designated employees must disqualify themselves from making or participating in the making of any decision.

The Proposed Code

1. Who are Designated Employees?

Under Proposition 9, all Commissioners and Alternates are designated employees and are therefore also included as such in the proposed code. In addition, all professional members of the staff, all consultants and special employees of the Commission, and the members of the Design and Engineering Boards have been determined to be designated employees because, under the provisions of the Act and the regulations of the FPPC, they "make or participate in the making of decisions which may foreseeably have a material financial effect on a financial interest."

The members of the Citizens Advisory Committee are not designated employees. They are unsalaried members of a solely advisory board, and under Proposition 9, unsalaried members of such boards are specifically excluded from the definition of designated employee.

2. When Must Disclosure Statements be Filed?

The Code requires that present Commissioners, Alternates, professional staff members, and the members of the Design and Engineering Boards file an initial disclosure statement within thirty (30) days of the effective date of the Code; an annual statement in January of each year thereafter; and a "leaving office statement" within thirty (30) days after leaving office.

Consultants and special employees will have their filing requirements determined by the Commission on a case-by-case basis.

3. What Must Each Statement Contain?

- a. The Initial Statement. The initial statement must disclose all reportable investments, interests in real property, and management positions.
- b. The Annual Statement. In addition to reportable investments, interests in real property, and management positions, the annual statement must include reportable income received during the period covered by the statement.
- c. The Leaving Office Statement. The leaving office statement must include the same information as the annual statement, but for the period between the filing of the last annual statement and the date of the filing of the leaving office statement.

4. What are "Investments," "Interests in Real Property," "Income," and "Management Positions"?

For purposes of the Code, the definitions of "investments," "interests in real property," "income," and "management positions" are identical to the definitions of those terms contained in Proposition 9 and the regulations of the FPPC. Copies of the Act and the FPPC regulations are available on request from the Commission office; however, the staff strongly recommends that Commissioners, Alternates, and others first read the enclosed draft instruction manual. This manual discusses what each of these terms means in language that is much easier to understand than the technical language contained in Proposition 9, and should answer most questions.

5. When are Investments, Interest in Real Property, Income, or Management Positions "Reportable" for Commissioners, Alternates, Professional Staff Members and Members of the Design and Engineering Boards?

"Investments" are reportable if the business entity in which the investment is held has an interest in real property in the Commission's jurisdiction, or does business, or plans to do business, within the Commission's jurisdiction, or has done business within the Commission's jurisdiction at any time during the two years prior to the time any statement is required to be filed under the Code.

An "interest in real property" is reportable if the property or any part of it is located within or not more than two miles outside the Commission's jurisdiction.

"Income," other than a gift, is reportable if it is received from a source within the Commission's jurisdiction, or from a source doing business within the Commission's jurisdiction, planning to do business within the Commission's jurisdiction, or that has done business within the Commission's jurisdiction during the two years prior to the time any statement is required under the Code.

"Management positions" are reportable if the business entity in which the position is held is doing business or plans to do business within the Commission's jurisdiction, or has done business within the Commission's jurisdiction at any time during the two years prior to the time any statement is required under the Code.

6. Why are There Only Two Disclosure Categories, and Why does the Same Category Apply to Members of the Staff and the Members of the Design and Engineering Boards?

The staff and representatives of the Attorney General's office have carefully analyzed each position on the staff and the role and responsibility of both the Design and Engineering Boards. This analysis led to the conclusion that the process leading to the Commission's planning and permit decisions was impossible to divide up in any way that led to logical differences in disclosure requirements. In other words, all designated employees participate in the making of the Commission's decisions because of the small size of the BCDC staff, the wide variety of assignments handled by each staff member, the relative independence of each staff member in carrying out his or her work, the involvement of all staff members in planning and permit decisions, the involvement of the members of the Design and Engineering Boards in permit decisions, and the close relationship between the Commission's planning and permit decisions under the McAteer-Petris Act.

The second category is proposed for special employees and consultants because they are hired to work on specific projects that relate only to a small portion of the Commission's overall decision-making responsibilities and usually only to a portion of the Commission's geographical jurisdiction as well.

7. When May a Conflict of Interest Exist Under Proposition 9 and the Proposed Code?

A conflict of interest clearly exists, and the designated employee should disqualify him- or herself from participating in the making of the decision, whenever the decision may have a material effect on a financial interest required to be disclosed under the proposed Code.

8. Why Isn't the Proposed Code More Specific?

The proposed Code is based very closely on a model code distributed by the Fair Political Practices Commission. It does not attempt to provide an answer in advance to every conceivable question that may arise out of the widely

differing financial situations existing among the Commissioners, Alternates, staff members and other designated employees. Nor could it do so without rivaling the Internal Revenue Code in both length and complexity.

Rather, the Code is intended to provide guidelines to designated employees as to when disclosure of economic interests is required and when a conflict of interest may exist under Proposition 9. The Attorney-General recommends, and the staff concurs, that questions regarding the application of Proposition 9 and the proposed Code in specific situations be referred to the staff for resolution on an individual basis with the assistance of the Attorney-General, and, where necessary, an opinion from the FPPC. This process will protect the privacy of designated employees while at the same time ensuring careful and thorough consideration of each case on its merits.

Staff Recommendation

The staff recommends:

1. At the conclusion of testimony on this matter on January 6, 1977, the Commission continue the public hearing on the proposed Code until the meeting of January 20, 1977.
2. At the conclusion of the continued hearing on January 20, 1977, the Commission approve the proposed Code for submission to the FPPC, which must approve it before it can become effective.
3. Also at the January 20th meeting, the Commission approve the proposed forms for use in filing the statements required under the proposed Code and authorize the staff to make technical changes in the forms if necessary to meet the requirements of the FPPC.

NOTICE OF PROPOSED CHANGES IN THE
REGULATIONS OF THE SAN FRANCISCO
BAY CONSERVATION AND DEVELOPMENT
COMMISSION

Notice is hereby given that the San Francisco Bay Conservation and Development Commission proposes to adopt a Conflict of Interest Code pursuant to Government Code Sections 87300 and 87311 as follows:

- (1) Add chapter II to Title 14 of the California Administrative Code to read:

Chapter II San Francisco Bay Conservation and Development Commission - Conflict of Interest Code.

11200. Introduction

On June 4, 1974, the Political Reform Act of 1974 was enacted into law. Among the goals the Act seeks to achieve are the following:

1. Public employees should perform their duties in an impartial manner free from bias caused by their own financial interests.
2. Assets and income of public employees which may be materially affected by their official actions should be disclosed and, in appropriate circumstances, the employee should be disqualified from acting in

order that conflicts of interest may be avoided.

To accomplish the above goals and to satisfy the requirements of law, the San Francisco Bay Development (hereinafter "the Commission") and Conservation Commission adopts the following Conflict of Interest Code.

This Code has the force of law and any violation of the Code by a designated employee may subject the employee to the sanctions provided by law.

The provisions of this Code supplement Government Code Sections 19251 and 87100, and other laws pertaining to conflicts of interest.

Section 11300. Designated Positions. The positions listed in Section 11900 are designated positions. Persons holding these positions are designated employees and are deemed to make or participate in the making of decisions which may foreseeably have a material effect on a financial interest.

Section 11350. Disclosure Categories. Disclosure categories for designated employees are set forth in Section 11950. Each designated employee shall file an initial, annual and leaving office statement disclosing that person's interest in investments, real property, income, and management positions designated as reportable under the category to which the person's position is

assigned in Section 11950.

Section 11400. Place and Time of Filing.

(a) All designated employees required to submit a statement disclosing economic interests shall file the original with the Commission.

(b) Upon receipt of the statements of economic interests of the Commissioners and Executive Director, the Commission shall make and retain a copy and forward the originals of these statements to the Fair Political Practices Commission. Originals of all other statements shall be kept on file with the Commission.

(c) All designated employees shall file an initial statement within thirty days after the effective date of this Code.

(d) Subsequent to the effective date of this Code, each person appointed to the Commission, or as Executive Director thereof, shall file, not less than ten days before assuming office, an initial statement disclosing economic interests. All other persons appointed, promoted, or transferred to designated positions subsequent to the effective date of this Code shall file initial disclosure statements within thirty days after the date of their employment in a designated position specified in Section

11900.

(e) Annual statements disclosing economic interests shall be filed by all designated employees during January of each year.

(f) Each person who leaves a designated position specified in Section 11900 shall file, within thirty days after leaving office, a statement disclosing economic interests.

Section 11450. Contents of Disclosure Statements.

(a) Disclosure statements shall be made on forms approved by and supplied by the Commission, and shall contain the following information:

(1) Contents of Investment and Real Property

Reports:

When an investment, or an interest in real property, is required to be reported under Section 11950, the statement shall contain:

(A) A statement of the nature of the investment or interest;

(B) The name of the business entity in which each investment is held, and a general description of the business activity in which the business entity is engaged;

(C) The address or other precise location of the real property;

(D) A statement as to whether the fair market value of the investment, or interest in real property, exceeds ten thousand dollars (\$10,000), and whether it exceeds one hundred thousand dollars (\$100,000). This information need not be provided with respect to an interest in real property which is used principally as the residence of the filer.

(2) Contents of Personal Income Reports:

When personal income is required to be reported under Section 11950, the statement shall contain:

(A) The name and address of each source of income aggregating two hundred and fifty dollars (\$250) or more in value, or twenty-five dollars or more in value if the income was a gift, and a general description of the business activity, if any, of each source;

(B) A statement whether the aggregate value of income from each source was greater than one thousand dollars (\$1,000), and whether it was greater than ten thousand dollars (\$10,000);

(C) A description of the consideration, if any, for which the income was received;

(D) In the case of a gift, the name and address of the donor and the amount and the date on which the gift was received.

(3) Contents of Business Entity Income Reports:

When income of a business entity, including income of a sole proprietorship, is required to be reported under Section 11950, the statement shall contain:

(A) The name, address, and a general description of the business activity of the business entity;

(B) In the case of a business entity which provides legal or brokerage services, the name of every person who paid fees to the business entity if the filer's pro rata share of fees from such person was equal to or greater than one thousand dollars (\$1,000);

(C) In the case of a business entity not covered by paragraph (B), the name of every person from whom the business entity received payments if the filer's pro rata share of gross receipts from such person was equal to or

greater than ten thousand dollars (\$10,000) during a calendar year.

(4) Contents of Management Position Reports

When management positions are required to be reported, designated employees shall list the name of each business entity not otherwise disclosed under 11450(a)(3) in which he is a director, officer, partner, trustee, employee, or in which he holds any position of management.

(b) Contents of Initial Statement:

The initial statement filed by a person appointed, promoted, or transferred to a designated position shall disclose any reportable investments, interests in real property, and management positions.

(c) Contents of Annual Statements:

The annual statement filed by a designated employee shall disclose any reportable investments, interests in real property, management positions, and income during the period since the previous statement was filed.

(d) Contents of Leaving Office Statements:

The leaving office statement filed by designated employees shall disclose reportable investments, interests in real property, management positions, and income during the period since the closing date of the previous statement filed pursuant to this Code. The statement shall

include any investments in business entities, interests in real property, management positions and income held or received at any time during the period covered by the statement, whether or not they are still held or are being received at the time of filing.

(e) Acquisition or Disposal During Reporting

Period:

In the case of a statement filed under Sections 11450(c) and (d), if the investment or interest in real property was partially or wholly acquired or disposed of during the period covered by the statement, the date of acquisition or disposal.

Section 11500. Disqualification. Designated employees must disqualify themselves from making or participating in the making of any decision which will foreseeably have a material financial effect, distinguishable from its effect on the public generally, on any reportable interest of that employee (except sources of gifts less than \$250). No designated employee shall be prevented from making or participating in the making of any decision to the extent his or her participation is legally required for the decision to be made.

Section 11600. Manner of Disqualification. A designated employee required to disqualify himself or herself shall

notify his or her supervisor in writing. This notice shall be forwarded to the Executive Director, who shall record the employee's disqualification. Upon receipt of such statement, the supervisor shall immediately reassign the matter to another employee.

In the case of a designated employee who is a member of the Commission, notice of disqualification shall be given at any meeting during which consideration of the decision takes place and shall be made part of the official record of the Commission. The member shall then refrain from participating and shall attempt in no way to use his or her official position to influence any other person with respect to the matter.

Section 11700. Definition of Terms. Except as otherwise provided in subsection (6), the definitions contained in the Political Reform Act of 1974 (Government Code §81000 et seq.), the Regulations of the Fair Political Practices Commission, and any amendments to the Act or Regulations, are incorporated into this Conflict of Interest Code.

(b) "Commission jurisdiction" as used in this Code means the areas defined by Government Code Section 66610 and Fish and Game Code Sections 1864, 1865 and 1866.

Section 11800. Effective Date of Code. This Conflict of Interest Code shall become effective 30 days after

approval by the Fair Political Practices Commission.

Section 11900. Designated Positions Category

Chairman, all Commissioners and A
alternates; the Executive Director
and all staff except those
in the following Civil Service
categories: Senior Stenographer,
Stenographer, Senior Legal Secretary,
Clerk Typist II and the Assistant
Executive Director for Adminis-
tration. Also excepted are Graduate
Assistants, work-study students, and
members of the Citizens Advisory
Committee

All members of the Engineering Criteria A
Review Board and Design Review Committee

Consultants & Special project employees B

Section 11950. Disclosure Categories (Reportable Interests)

Category A

Persons in this category must report all
investments, interests in real property, income, and any

management position with any business entity in which the person is a director, officer, partner, trustee, employee, or holds any position of management, subject to the following limitations:

1. Income, other than a gift, is reportable only if it is received from a source within the Commission's jurisdiction, or if that source is doing business within the Commission's jurisdiction, planning to do business within the Commission's jurisdiction, or has done business within the Commission's jurisdiction during the two years prior to the time any statement is required under this Code.
2. An interest in real property is reportable only if the property, or any part of it, is located within or not more than two miles outside the boundaries of the jurisdiction.
3. Investments are reportable only if the business entity has an interest in real property in the Commission's jurisdiction, or does business, or plans to do business in the Commission's jurisdiction, or has done business within the Commission's jurisdiction at any time during the two years prior to the time any statement is required under this Code.

4. Business entities are reportable for purposes of management position disclosure, only if the business entity is doing business, or plans to do business within the Commission's jurisdiction, or has done business within the Commission's jurisdiction at any time during the two years prior to the time any statement is required under this Code.

Category B

Persons in this category (consultants and special employees) shall have the extent of their reportable economic interest and the filing requirements related thereto determined by the Commission on a case by case basis at public hearing prior to their employment. A record of the proceedings in all such determinations shall be kept on file in the office of the Commission for seven years.

INSTRUCTION MANUAL
FOR
STATEMENT OF ECONOMIC INTERESTS

FOR DESIGNATED EMPLOYEES*
FILING PURSUANT TO A CONFLICT OF INTEREST CODE

If you are reading this, you are probably a person whose position within a governmental agency has been designated to be within the coverage of a Conflict of Interest Code. This determination to designate your position means that you will be required to disclose certain economic interests. The Code of your agency was required to be adopted by the Political Reform Act of 1974. This is a complicated Act, and so is the satisfaction of disclosure requirements of your Code. The introductory material and Statement of Economic Interests manual provisions which follow may not answer all of your questions concerning your disclosure requirements. If you have further questions in this regard, please contact the person responsible for filing statements in your agency. The staff of the Fair Political Practices Commission is available to assist designated officials if their agency is unable to do so.

Conflict of Interest Codes require designated employees or officials to file statements disclosing certain economic interests which may foreseeably be affected materially by any decision made or participated in by the designated official because of his or her official position.

The amount of disclosure required by any employee is based on his or her official duties. Each designated official will be required to disclose only those types of financial interests, as set forth in the Code, which are relevant to the duties of the employee. The Code must specifically inform each designated official of the types of economic interests which must be disclosed.

This manual and the Statement of Economic Interests is designed to apply to all designated employees, regardless of the disclosure categories. When completing your Statement of Economic Interests, you should refer to your Conflict of Interest Code to determine the disclosure requirements applicable to your position, and complete only the applicable schedules.

Each designated employee must disclose all of his or her interests which are made reportable for his or her position as set forth in the Code.

*Throughout this manual the term designated employee and designated official are used interchangeably to refer to persons who occupy positions designated within a Conflict of Interest Code.

These instructions are intended to assist designated employees and officials to comply with the financial disclosure requirements of Conflict of Interest Codes, when they must file:

- initial statements
- annual statements
- leaving office statements

WHAT IS A STATEMENT OF ECONOMIC INTERESTS?

A Statement of Economic Interests is a form which discloses certain economic interests of the official, and which is available for inspection by the public at the agency of the official.

WHO MUST FILE STATEMENTS?

Statements of Economic Interests must be filed by agency employees and officials whose positions are designated in a Conflict of Interest Code of their agency.

WHEN MUST STATEMENTS BE FILED?

Statements of Economic Interests are filed annually during the period prescribed by a Conflict of Interest Code. However, statements must also be filed 10 days prior to assuming an appointed designated position; within 30 days after a person is transferred to a different designated position; and within 30 days after a person leaves a designated position.

WHAT PERIOD SHOULD THE STATEMENT COVER?

Initial statements disclose reportable investments in business entities which do business within the jurisdiction* and interests in real property within the jurisdiction (and management positions in business entities if required by the code) held by the designated official on the effective date of the code. In addition, when a person is appointed to a designated position, the statement shall disclose reportable investments in business entities which do business within the jurisdiction and interests in real property within the jurisdiction (and management positions in business entities if required by the code) held by the designated official at the time of filing. Disclosure of income, including gifts, shall not be required by a Conflict of Interest Code on initial statements.

*"Jurisdiction" means the state with respect to a state agency and, with respect to a local government agency, the region, county, city, district or other geographical area in which it has jurisdiction. Real property shall be deemed to be "within the jurisdiction" with respect to a local government agency if the property or any part of it is located within or not more than two miles outside the boundaries of the jurisdiction or within two miles of any land owned or used by the local government agency.

Annual statements will cover the period from one day following the closing date of the last statement filed by the designated official to the closing date specified in the code. Annual statements disclose reportable investments in business entities which do business within the jurisdiction, interests in real property within the jurisdiction, and income, including gifts (and management positions in business entities if required by the code) made reportable by the Conflict of Interest Code.

Leaving office statements will cover the period from one day following the closing date of the last statement filed by the designated official to the date of leaving office. Leaving office statements disclose reportable investments in business entities which do business within the jurisdiction, interests in real property within the jurisdiction, and income, including gifts, (and management positions in business entities if required by the code) made reportable by the Conflict of Interest Code.

WHERE MUST STATEMENTS BE FILED?

Statements are filed with your agency, and as specified in the code.

HOW TO COMPLETE A STATEMENT OF ECONOMIC INTERESTS

REPORTABLE INTERESTS

Designated employees who must complete Statements of Economic Interests are required to disclose certain investments and/or interests in real property and/or income. Each designated employee discloses pursuant to his or her disclosure category, as indicated in his or her agency's Conflict of Interest Code. Your Conflict of Interest Code, thus, determines your reportable interests. Rely on your code to inform you of what is reportable.

INVESTMENTS

No asset shall be deemed an investment unless its fair market value exceeds \$1,000.

NOTE: Check the disclosure requirements for your position to determine which investments in business entities, if any, you are required to disclose.

Any investments held by your spouse or dependent children must be reported as though held by you personally.

In addition, if you or your spouse owns directly, indirectly, or beneficially a 10% or greater interest in a business entity or trust, you must report your pro rata share of investments of that entity or trust, if your share is worth over \$1,000.

For each reportable investment you must report the following information:

- Nature of the investment (e.g., common stock, partnership).
- Name of the business entity and a general description of the business activity.
- Date you acquired or disposed of the investment if you did so during the period covered by the statement. (Not applicable for initial statements.)
- Value of your investment. For purposes of determining whether or not the value of an investment exceeds \$1,000, \$10,000 or \$100,000, you should consider the highest value of the asset during the period. (Highest value determination is not applicable for initial statements.)

EXCEPTIONS: You are not required to disclose the following:

- Time or demand deposit in a financial institution.
- Shares in a credit union.
- Any insurance policy.
- Any bond or other debt instrument issued by any government or government agency.

SAMPLE

(Assume that each of the investments below is made reportable by your Conflict of Interest Code.)

On February 1 you purchased \$800 worth of stock in XYZ Corporation, a corporation doing business in your jurisdiction. On March 1 the stock had a market value of \$1,200. On May 1, you sold the stock for \$900. (You must list the stock because for part of the period covered by the Statement your investment was worth more than \$1,000.

In addition, you have a 10% partnership interest worth \$40,000 in your insurance firm which owns stock in General Utilities Company, your pro rata share being \$1,500. Both your insurance firm and General Utilities Company do business in your jurisdiction. The investment schedule would be completed as follows:

XYZ Corporation (Name of Company)		Check One	
Common stock (Nature of Interests, e.g., Common Stock, Partnership Interest, etc.)		☒	Value does not exceed \$10,000
Manufactures widgets (General Description of Business Activity)		☐	Value exceeds \$10,000 but does not exceed \$100,000
Acquired Disposed 5/1/75		☐	Value exceeds \$100,000
Smith & Black (Name of Company)		Check One	
Partnership (Nature of Interests, e.g., Common Stock, Partnership Interest, etc.)		☐	Value does not exceed \$10,000
Insurance brokers (General Description of Business Activity)		☒	Value exceeds \$10,000 but does not exceed \$100,000
Acquired Disposed		☐	Value exceeds \$100,000
General Utilities (Name of Company)		Check One	
Common Stock (Nature of Interests, e.g., Common Stock, Partnership Interest, etc.)		☒	Value does not exceed \$10,000
Serves electric power (General Description of Business Activity)		☐	Value exceeds \$10,000 but does not exceed \$100,000
Acquired Disposed		☐	Value exceeds \$100,000

INTERESTS IN REAL PROPERTY

No interest in real property shall be reportable unless its fair market value exceeds \$1,000.

NOTE: Check your disclosure category to determine which interests in real property, if any, you are required to disclose.

Any interests in real property held by your spouse or dependent children must be reported as though held by you personally.

In addition, if you or your spouse owns, directly, indirectly or beneficially a 10% or greater interest in any business entity or trust which holds real property in your jurisdiction, you must report your pro rata share of the interest if your share is worth over \$1,000.

For each reportable interest in real property you must show the following:

- Street address or precise location. If there is no street address, you must state the lot number and subdivision of the real property.
- Nature of your interest (e.g., ownership, option).
- Date you acquired or disposed of the real property if you did so during the period covered by the Statement. (Not applicable for initial statements.)
- Value of your interest. To determine the value of your interest, you should only consider your equity interest. For example, if you own property worth \$25,000 in which you have an \$8,000 equity, your reportable interest is \$8,000.

(Assume that each of the interests in real property below is made reportable by your Conflict of Interest Code.)

You are purchasing a home in your jurisdiction and you also have an equity interest worth \$4,500 in a lot in your jurisdiction. (As a general rule Conflict of Interest Codes will not require the disclosure of real property which serves as the principal residence of the filer. However, where the residence is also used for a commercial or business purposes or where the residence may foreseeably be affected materially as a normal consequence of the official's action, disclosure of the residence will be required by the code). In addition, Smith and Jones, the business in which you have a 20 percent interest recently purchased a commercial building in Mudville, having a fair market value of \$125,000. The interest in real property schedule would be completed as follows:

1345 Third Street, Mudville (Street Address or Precise Location of Property)		Check One ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000 ☒ Property is used principally as my residence
Equity (Nature of Interest, e.g., Equity, Option)	Date Acquired Date Disposed	
Lot 212, Idylwilde Subdivision, Mudville (Street Address or Precise Location of Property)		Check One ☒ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
Equity (Nature of Interest, e.g., Equity, Option)	Date Acquired Date Disposed	
555 Main Street, Mudville (Street Address or Precise Location of Property)		Check One ☐ Value does not exceed \$10,000 ☒ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
Equity (Nature of Interest, e.g., Equity, Option)	Date Acquired 9/5/75 Date Disposed	

INVESTMENTS AND INTERESTS IN REAL PROPERTY HELD BY BUSINESS ENTITIES YOU CONTROL

NOTE: Complete only those schedules which your disclosure category requires.

If you, your spouse or dependent children hold an ownership interest of 50% or more in a business entity listed on the Investment Schedule, you must report all investments, worth over \$1,000, of that entity in business entities which do business, plan to do business or have done business in the last two years in your jurisdiction and all interests in real property worth over \$1,000 held by that entity within your jurisdiction. A separate schedule must be completed for each business entity.

For each investment held by such a business entity you must disclose the name, the nature of the investment, a general description of the business activity, the date the interest was acquired or disposed of if it falls within the period covered by your report, and the value.

For real property within your jurisdiction held such a business entity, you must disclose the street address or precise location, the nature of the interest held, the date of acquisition or disposal if it falls within the period covered by the report, and the value.

SAMPLE

(Assume that each of the investments and interests in real property below is made reportable by your Conflict of Interest Code.)

On September 6, 1975, Metro Properties, Inc., in which you own a 75% interest, purchased an apartment complex, The Parkside, located in your jurisdiction and valued at \$280,000. Metro Properties also purchased at the same time the undeveloped lot worth \$25,000 adjacent to the complex. This schedule would be completed as follows:

Name of Business Entity Metro Properties, Inc.

INVESTMENTS OVER \$1,000 HELD BY BUSINESS ENTITY

		Check One
The Parkside		
(Name of Company)		☐ Value does not exceed \$10,000
Partnership Interest		☐ Value exceeds \$10,000 but does not exceed \$100,000
(Nature of Investment, e.g., Common stock, Partnership Interest, etc.)		☒ Value exceeds \$100,000
Apartment Complex	Acquired 9/6/75	
(General Description of Business Activity)	Disposed	

INTERESTS IN REAL PROPERTY OVER \$1,000 HELD BY BUSINESS ENTITY

		Check One
Lot 1014, Briarwood Subdivision, Mudville		
(Street Address or Precise Location of Property)		☐ Value does not exceed \$10,000
Equity	Acquired 9/6/75	☒ Value exceeds \$10,000 but does not exceed \$100,000
(Nature of Interest, e.g., Equity, Option)	Disposed	☐ Value exceeds \$100,000

INCOME

Only income aggregating \$250 or more from a reportable source during the reporting period must be reported. You must also report as income any community property interest you have in income from a reportable source received by your spouse. Otherwise, you are not required to report income of your spouse or your children.

NOTE: Check your disclosure category to determine what income, if any, you are required to disclose.

When income from a reportable source is reported, you must disclose the following:

- Name of the source of income.
- Address of the source of income.
- Business activity of the source of income.
- Description of the consideration, if any, for the income.
- Amount or value received.

EXCEPTIONS: you are not required to disclose the following:

- Salary or reimbursements for expenses and per diem received from a state or local government agency.
- Reimbursement for travel expenses and per diem received from a bona fide educational, academic or charitable organization.
- Campaign contributions.
- Devise or inheritance.
- Dividends, interests or other return on a security which is registered with the Securities and Exchange Commission of the U. S. Government.
- Interest, dividends or premiums on a time or demand deposit in a financial institution, shares in a credit union or insurance policy, payments received under an insurance policy, bond or other debt instrument issued by a government agency.

SAMPLE

(Assume that the income below is made reportable by your Conflict of Interest Code.)

Designated official X owns stock in California Widget Corporation, a large publicly owned company listed on the New York Stock Exchange and doing business in his jurisdiction. He received \$2,000 during the period in dividends on his stock. He also received \$15,000 salary income from his insurance business, and \$1,500 interest income from a plumbing business. Both the insurance business and the plumbing business operate in his jurisdiction. He need not report the dividend as income since his stock is registered with the Securities and Exchange Commission. The income schedule would be completed as follows:

Smith and Jones Insurance Co. (Name of the Source of Income) 110 Main Street Mudville, California (Address of the Source of Income) Insurance brokerage (Business Activity of the Source of Income)	<i>Check One</i> ☐ Amount or value received was not greater than \$1,000 ☐ Amount or value received was greater than \$1,000 and was not greater than \$10,000 ☒ Amount or value received was greater than \$10,000
Personal Services (Description of the consideration, if any, for the Income)	
Hank's Plumbing Supply (Name of the Source of Income) 104 Main Street Mudville, California (Address of the Source of Income) Plumbing supply (Business Activity of the Source of Income)	<i>Check One</i> ☐ Amount or value received was not greater than \$1,000 ☒ Amount or value received was greater than \$1,000 and was not greater than \$10,000 ☐ Amount or value received was greater than \$10,000
Return on Investment (Description of the Consideration, if any, for the Income)	

GIFTS

Gifts which have an aggregate value of \$25 or more, received from reportable sources of income, during the reporting period must be reported.

NOTE: Check your disclosure category to determine what income, if any, you are required to disclose.

For each reportable gift you must disclose the following:

- Name of the donor.
- Address of the donor.
- Business activity, if any, of the donor.
- Date(s) gift(s) received.
- Value of the gift(s).
- Description of the gift(s).

EXCEPTIONS: You are not required to disclose the following:

- Gifts from your spouse, child, parent, grandparent, grandchild, brother, sister, parent-in-law, brother-in-law, sister-in-law, aunt, uncle, or first cousin or the spouse of any such person, provided that a gift from any such person shall be considered income if the donor is acting as an agent or intermediary for any person who is a reportable source of income.
- Gifts of informational material, such as books, pamphlets, reports, calendars or periodicals.
- Gifts which are not used and which, within 30 days after receipt, are returned to the donor or delivered to a charitable organization without being claimed as a charitable contribution for tax purposes.

Gifts become reportable when the value received from one reportable source of income during the reporting period totals \$25 or more.

SAMPLE

(Assume that the gifts were received from sources made reportable by your Conflict of Interest Code.)

You received complimentary season tickets worth \$100 from your local professional football team. You also received a complimentary dinner certificate worth \$75 from a local restaurant. The gift schedule would be completed as follows:

Hangtown Hornets (Name of Donor) 200 Main Street, Mudville (Address) Football Team (Business Activity, if any, of the donor)	3/1/74 (Date(s) of Gift(s)) \$100 (Value of Gift) Season Tickets (Description of Gift)
Le Connoisseur Restaurant (Name of Donor) 1100 Fifth Street, Mudville (Address) Restaurant (Business Activity, if any, of the Donor)	9/15/75 (Date(s) of Gift(s)) \$75 (Value of Gift) Food and Drink (Description of Gift)

INCOME OF A BUSINESS ENTITY IN WHICH THE DESIGNATED EMPLOYEE,
OR SPOUSE, OWNS A 10% OR GREATER INTEREST AND WHICH PROVIDES
LEGAL OR BROKERAGE SERVICES

(The filer's pro rata share of the fees paid to the
business entity which provides legal or brokerage
services must be at least \$1,000.)

You may be required to report the name, address and business activity of a business entity which provides legal or brokerage services and the name of persons* who paid fees to the business entity if all the following conditions are met:

1. Your disclosure category makes sources of income disclosable;
2. The persons who paid fees to the business entity are reportable sources of income pursuant to your income reporting requirements as set forth in the code;
3. You or your spouse owns, directly, indirectly or beneficially, a ten percent interest or greater of the business entity; and,
4. Your pro rata share of fees which a person paid to the entity was \$1,000 or more, during the period covered by the statement.

*"Person" means an individual, proprietorship, firm, partnership, joint venture, syndicate, business trust, company, corporation, association, committee, and any other organization or group of persons acting in concert.

SAMPLE

(Assume that Brown, Black, and Green are reportable
sources of income.)

Smith and Jones, an insurance firm in which you have a 50% interest, received a commission of \$2,000 from Brown, commission of \$5,000 from Green and a commission of \$1,500 from Black. (You need not list Black's name because your share was only \$750, less than \$1,000.) This schedule would be completed as follows:

Smith and Jones
(Name of Business Entity)
110 Main Street, Mudville, California
(Address of Business Entity)
Insurance brokers
(Description of its Business Activity)

List the name of each individual or entity who paid fees to the above business entity if your pro rata share of the fees was \$1,000 or more.

James Alan Brown

Paul Everett Green

INCOME OF A BUSINESS ENTITY IN WHICH THE DESIGNATED EMPLOYEE,
OR SPOUSE, OWNS 10% OR GREATER INTEREST WHICH DOES NOT
PROVIDE LEGAL OR BROKERAGE SERVICES

(The filer's pro rata share of the fees paid to the
business entity which does not provide legal or
brokerage services must be at least \$10,000.)

You may be required to report the name, address and business activity
of a business entity which does not provide legal or brokerage services
and the name of persons* who paid fees to the business entity if all the
following conditions are met:

1. Your disclosure category makes sources of income disclosable;
2. The persons who paid fees to the business entity are reportable
sources of income pursuant to your income reporting requirements
as set forth in the code;
3. You or your spouse owns, directly, indirectly or beneficially,
a ten percent interest or greater of the business entity; and,
4. Your pro rata share of fees which a person paid to the entity
was \$10,000, or more, during the period covered by the statement.

*"Person" means an individual, proprietorship, firm, partnership, joint
venture, syndicate, business trust, company, corporation, association,
committee, and any other organization or group of persons acting in
concert.

SAMPLE

(Assume that Super Hotel Corporation and Mudville Construction
are reportable sources of income.)

You own one-third of Hank's Plumbing Supply which sold \$30,000 worth of
equipment to Super Hotel Corporation. You own 5% of California Lumber
Company which sold \$200,000 worth of lumber to Mudville Construction
Company. You need not report information concerning the California
Lumber Company since you own less than 10% interest in the business,
but you must list Super Hotel Corporation since you own more than
10% of Hank's Plumbing Supply and your pro rata share of gross receipts
from Super Hotel Corporation was \$10,000. This schedule would be
completed as follows:

Hank's Plumbing Supply

(Name of Business Entity)

104 Main Street, Mudville, California

(Address of Business Entity)

Plumbing supply

(Description of its Business Activity)

List the name of each individual or entity from whom the above business entity received payments if your pro rata share of gross receipts from
the individual or entity was \$10,000 or more:

Super Hotel Corp.

EMPLOYMENT AND MANAGEMENT POSITIONS
IN BUSINESS ENTITIES

NOTE: Complete only those schedules which your disclosure category requires. (Most codes will not require the disclosure of "management positions.")

You may be required to report your employment or holding of management positions in a business entity, including a position as a director, officer, partner, trustee, employee or any position of management.

When employment and management positions in business entities are required to be reported, you must disclose the following:

- Name of the entity.
- Address of the entity.
- General description of the business activity.
- Your position within the entity.

SAMPLE

(Assume that the management positions held in business entities of the kind listed below are made reportable by your Conflict of Interest Code.)

You are vice president of General Widgets, Inc., a corporation within your jurisdiction. This schedule would be completed as follows:

General Widgets, Inc.

(Name of Company)

107 So. Broadway, Los Angeles, CA

(Street Address, City, State)

Manufactures and Distributes Widgets

(General Description of Business Activity)

Vice President

(Your Job Title or Position)

SHORT FORM
STATEMENT OF ECONOMIC INTERESTS

If you have no interests to report, as required by your Conflict of Interest Code, or, if there has been no change in your reportable interests since the previous statement filed, you may complete the Short Form. If you are declaring that there has been no change in your reportable interests, you must attach a copy of the statement, filed previously, which states your economic interests.



FOR DESIGNATED EMPLOYEE

(NOTE: Complete only those schedules applicable to your disclosure category)

See Instruction Manual for Statement of Economic Interests

1. Name: _____
2. Address: _____
3. Department: _____
4. Designated Position: _____

5. Check the appropriate box:

- ☐ This is my initial Statement. (File within 30 days after the effective date of the Conflict of Interest Code.)
- ☐ I have been appointed to the above-named position and will assume the position on _____. (File 10 days prior to assuming the position.) (date)
- ☐ I have been transferred to the above named position and will assume the position on _____. (File within 30 days after assuming the position.) (date)
- ☐ This is my anniversary Statement. (File during the month of _____.)
- ☐ I left the above-named position as of _____. (File within 30 days of leaving office.) (date)

6. Period covered by the Statement: (Not applicable for initial or appointed Statements)

_____ to _____

VERIFICATION

I understand that this Statement is filed pursuant to a Conflict of Interest Code and requires that I disclose certain economic interests established by the Code for my position. I have declared all such reportable economic interests.

I declare under penalty of perjury that I have used all reasonable diligence in preparing this statement and to the best of my knowledge it is true and complete.

Executed on _____, 19____, at _____, California.

(Signature)

(Over \$1,000, required by Conflict of Interest Code)

See Instruction Manual for Statement of Economic Interests

Note: If your position requires the disclosure of investments, you should complete this schedule. If you have nothing to report, you should indicate "none."

(Name of Company) _____	<i>Check One</i> ☐ Value does not exceed \$10,000
(Nature of Interests, e.g., Common Stock, Partnership Interest, etc.) _____	☐ Value exceeds \$10,000 but does not exceed \$100,000
_____ Date Acquired _____ (General Description of Business Activity) _____ Date Disposed _____	☐ Value exceeds \$100,000
(Name of Company) _____	<i>Check One</i> ☐ Value does not exceed \$10,000
(Nature of Interests, e.g., Common Stock, Partnership Interest, etc.) _____	☐ Value exceeds \$10,000 but does not exceed \$100,000
_____ Date Acquired _____ (General Description of Business Activity) _____ Date Disposed _____	☐ Value exceeds \$100,000
(Name of Company) _____	<i>Check One</i> ☐ Value does not exceed \$10,000
(Nature of Interests, e.g., Common Stock, Partnership Interest, etc.) _____	☐ Value exceeds \$10,000 but does not exceed \$100,000
_____ Date Acquired _____ (General Description of Business Activity) _____ Date Disposed _____	☐ Value exceeds \$100,000
(Name of Company) _____	<i>Check One</i> ☐ Value does not exceed \$10,000
(Nature of Interests, e.g., Common Stock, Partnership Interest, etc.) _____	☐ Value exceeds \$10,000 but does not exceed \$100,000
_____ Date Acquired _____ (General Description of Business Activity) _____ Date Disposed _____	☐ Value exceeds \$100,000
(Name of Company) _____	<i>Check One</i> ☐ Value does not exceed \$10,000
(Nature of Interests, e.g., Common Stock, Partnership Interest, etc.) _____	☐ Value exceeds \$10,000 but does not exceed \$100,000
_____ Date Acquired _____ (General Description of Business Activity) _____ Date Disposed _____	☐ Value exceeds \$100,000
(Name of Company) _____	<i>Check One</i> ☐ Value does not exceed \$10,000
(Nature of Interests, e.g., Common Stock, Partnership Interest, etc.) _____	☐ Value exceeds \$10,000 but does not exceed \$100,000
_____ Date Acquired _____ (General Description of Business Activity) _____ Date Disposed _____	☐ Value exceeds \$100,000
(Name of Company) _____	<i>Check One</i> ☐ Value does not exceed \$10,000
(Nature of Interests, e.g., Common Stock, Partnership Interest, etc.) _____	☐ Value exceeds \$10,000 but does not exceed \$100,000
_____ Date Acquired _____ (General Description of Business Activity) _____ Date Disposed _____	☐ Value exceeds \$100,000

THE UNIVERSITY OF CHICAGO LIBRARY

It is the policy of the University of Chicago Library to acquire and maintain a comprehensive collection of books, journals, and other materials in the fields of the natural and social sciences, the arts, and the humanities. The library is committed to providing access to these materials for the benefit of the University and the wider community.

Acquisition	Disposition
1. Acquisition of new books	1. Disposition of old books
2. Acquisition of new journals	2. Disposition of old journals
3. Acquisition of new electronic resources	3. Disposition of old electronic resources
4. Acquisition of new archival materials	4. Disposition of old archival materials
5. Acquisition of new special collections	5. Disposition of old special collections
6. Acquisition of new rare books	6. Disposition of old rare books
7. Acquisition of new manuscripts	7. Disposition of old manuscripts
8. Acquisition of new maps	8. Disposition of old maps
9. Acquisition of new audio-visual materials	9. Disposition of old audio-visual materials
10. Acquisition of new digital resources	10. Disposition of old digital resources
11. Acquisition of new periodicals	11. Disposition of old periodicals
12. Acquisition of new reference works	12. Disposition of old reference works
13. Acquisition of new textbooks	13. Disposition of old textbooks
14. Acquisition of new children's books	14. Disposition of old children's books
15. Acquisition of new adult books	15. Disposition of old adult books
16. Acquisition of new young adult books	16. Disposition of old young adult books
17. Acquisition of new graphic novels	17. Disposition of old graphic novels
18. Acquisition of new comic books	18. Disposition of old comic books
19. Acquisition of new manga	19. Disposition of old manga
20. Acquisition of new anime	20. Disposition of old anime
21. Acquisition of new video games	21. Disposition of old video games
22. Acquisition of new board games	22. Disposition of old board games
23. Acquisition of new card games	23. Disposition of old card games
24. Acquisition of new puzzles	24. Disposition of old puzzles
25. Acquisition of new toys	25. Disposition of old toys
26. Acquisition of new clothing	26. Disposition of old clothing
27. Acquisition of new furniture	27. Disposition of old furniture
28. Acquisition of new appliances	28. Disposition of old appliances
29. Acquisition of new electronics	29. Disposition of old electronics
30. Acquisition of new vehicles	30. Disposition of old vehicles
31. Acquisition of new boats	31. Disposition of old boats
32. Acquisition of new aircraft	32. Disposition of old aircraft
33. Acquisition of new spacecraft	33. Disposition of old spacecraft
34. Acquisition of new submarines	34. Disposition of old submarines
35. Acquisition of new ships	35. Disposition of old ships
36. Acquisition of new yachts	36. Disposition of old yachts
37. Acquisition of new sailboats	37. Disposition of old sailboats
38. Acquisition of new rowboats	38. Disposition of old rowboats
39. Acquisition of new canoes	39. Disposition of old canoes
40. Acquisition of new kayaks	40. Disposition of old kayaks

INTERESTS IN REAL PROPERTY

(Over \$1,000, as required by Conflict of Interest Code)

See Instruction Manual for Statement of Economic Interests

Note: If your position requires the disclosure of interests in real property, you should complete this schedule. If you have nothing to report, you should indicate "none."

(Street Address or Precise Location of Property) (Nature of Interest, e.g., Equity, Option) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000 ☐ Property is used principally as my residence
(Street Address or Precise Location of Property) (Nature of Interest, e.g., Equity, Option) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
(Street Address or Precise Location of Property) (Nature of Interest, e.g., Equity, Option) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
(Street Address or Precise Location of Property) (Nature of Interest, e.g., Equity, Option) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
(Street Address or Precise Location of Property) (Nature of Interest, e.g., Equity, Option) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
(Street Address or Precise Location of Property) (Nature of Interest, e.g., Equity, Option) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
(Street Address or Precise Location of Property) (Nature of Interest, e.g., Equity, Option) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
(Street Address or Precise Location of Property) (Nature of Interest, e.g., Equity, Option) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000

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INVESTMENTS AND INTERESTS IN REAL PROPERTY
HELD BY BUSINESS ENTITIES YOU CONTROL

(Over \$1,000, as required by Conflict of Interest Code)

See Instruction Manual for Statement of Economic Interests

Note: If your position requires the disclosure of certain investments and interests in real property, disclose those kind of investments and interests in real property held by business entities you control on this schedule. If you have nothing to report, you should indicate "none."

Name of Business Entity

INVESTMENTS HELD BY BUSINESS ENTITY

(Name of Company) (Nature of Investment, e.g., Common Stock, Partnership Interest, etc.) (General Description of Business Activity) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
(Name of Company) (Nature of Investment, e.g., Common Stock, Partnership Interest, etc.) (General Description of Business Activity) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
(Name of Company) (Nature of Investment, e.g., Common Stock, Partnership Interest, etc.) (General Description of Business Activity) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000

Attach additional information on appropriately labeled continuation sheets.

INTERESTS IN REAL PROPERTY HELD BY BUSINESS ENTITY

(Street Address or Precise Location of Property) (Nature of Interest, e.g., Equity, Option) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
(Street Address or Precise Location of Property) (Nature of Interest, e.g., Equity, Option) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000
(Street Address or Precise Location of Property) (Nature of Interest, e.g., Equity, Option) Date Acquired Date Disposed	<i>Check One</i> ☐ Value does not exceed \$10,000 ☐ Value exceeds \$10,000 but does not exceed \$100,000 ☐ Value exceeds \$100,000

Attach additional information on appropriately labeled continuation sheets.

INCOME (OTHER THAN GIFTS)

(Aggregating \$250 or more from reportable sources of income as required by Conflict of Interest Code)

See Instruction Manual for Statement of Economic Interests

Note: If your position requires the disclosure of income, you should complete this schedule. If you have nothing to report, you should indicate "none."

(Name of the Source of Income)	<i>Check One</i> ☐ Amount or value received was not greater than \$1,000
(Address of the Source of Income)	☐ Amount or value received was greater than \$1,000 and was not greater than \$10,000
(Business Activity of the Source of Income)	☐ Amount or value received was greater than \$10,000
(Description of the consideration, if any, for the Income)	
(Name of the Source of Income)	<i>Check One</i> ☐ Amount or value received was not greater than \$1,000
(Address of the Source of Income)	☐ Amount or value received was greater than \$1,000 and was not greater than \$10,000
(Business Activity of the Source of Income)	☐ Amount or value received was greater than \$10,000
(Description of the Consideration, if any, for the Income)	
(Name of the Source of Income)	<i>Check One</i> ☐ Amount or value received was not greater than \$1,000
(Address of the Source of Income)	☐ Amount or value received was greater than \$1,000 and was not greater than \$10,000
(Business Activity of the Source of Income)	☐ Amount or value received was greater than \$10,000
(Description of the Consideration, if any, for the Income)	
(Name of the Source of Income)	<i>Check One</i> ☐ Amount or value received was not greater than \$1,000
(Address of the Source of Income)	☐ Amount or value received was greater than \$1,000 and was not greater than \$10,000
(Business Activity of the Source of Income)	☐ Amount or value received was greater than \$10,000
(Description of the Consideration, if any, for the Income)	
(Name of the Source of Income)	<i>Check One</i> ☐ Amount or value received was not greater than \$1,000
(Address of the Source of Income)	☐ Amount or value received was greater than \$1,000 and was not greater than \$10,000
(Business Activity of the Source of Income)	☐ Amount or value received was greater than \$10,000
(Description of the Consideration, if any, for the Income)	

GIFTS

(Aggregating \$25 or more from reportable sources of income as required by Conflict of Interest Code)

See Instruction Manual for Statement of Economic Interests

Note: If your position requires the disclosure of income, you should complete this schedule. If you have nothing to report, you should indicate "none."

(Name of Donor)	Date(s) of Gift(s)
(Address)	Value of Gift(s)
(Business Activity, if any, of the Donor)	Description of Gift(s)
(Name of Donor)	Date(s) of Gift(s)
(Address)	Value of Gift(s)
(Business Activity, if any, of the Donor)	Description of Gift(s)
(Name of Donor)	Date(s) of Gift(s)
(Address)	Value of Gift(s)
(Business Activity, if any, of the Donor)	Description of Gift(s)
(Name of Donor)	Date(s) of Gift(s)
(Address)	Value of Gift(s)
(Business Activity, if any, of the Donor)	Description of Gift(s)
(Name of Donor)	Date(s) of Gift(s)
(Address)	Value of Gift(s)
(Business Activity, if any, of the Donor)	Description of Gift(s)

INCOME OF A BUSINESS ENTITY IN WHICH THE DESIGNATED EMPLOYEE,
OR SPOUSE, OWNS A 10% OR GREATER INTEREST AND WHICH PROVIDES
LEGAL OR BROKERAGE SERVICES

(The filer's pro rata share of the fees paid to the business entity which provides legal or brokerage services must be at least \$1,000.)

See Instruction Manual for Statement of Economic Interests

(Name of Business Entity)

(Address of Business Entity)

(Description of Its Business Activity)

List the name of each individual or entity made reportable by the applicable income disclosure category of your code, which paid fees to the above business entity if your pro rata share of the fees was \$1,000 or more.

ENCLOSURE OF A DOCUMENT
OF 1900, WITH A LIST OF
ITEMS TO BE KEPT

(The following is a list of the items
which are to be kept in the
collection of the Library)

THE INFORMATION ABOUT THE DOCUMENTS

THE NAME OF THE DOCUMENT IS
THE NAME OF THE DOCUMENT IS
THE NAME OF THE DOCUMENT IS

(The filer's pro rata share of the fees paid to the business entity which does not provide legal or brokerage services must be at least \$10,000.)

(Name of Business Entity)

(Address of Business Entity)

(Description of its Business Activity)

List the name of each individual or entity made reportable by the applicable income disclosure category of your code, from whom the above business entity received payments if your pro rata share of gross receipts from the individual or entity was \$10,000 or more:

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ANN ARBOR, MICHIGAN 48106-1000
TEL: (313) 763-1000 FAX: (313) 763-1001

THE UNIVERSITY OF MICHIGAN LIBRARY

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ANN ARBOR, MICHIGAN 48106-1000
TEL: (313) 763-1000 FAX: (313) 763-1001

EMPLOYMENT AND MANAGEMENT POSITIONS
IN BUSINESS ENTITIES

(As required by Conflict of Interest Code)

See Instruction Manual for Statement of Economic Interests

Note: If your position requires the disclosure of management positions in business entities, you should complete this schedule. If you have nothing to report, you should indicate "none."

(Name of Company)

(Street Address, City, State)

(General Description of Business Activity)

(Your Job Title or Position)

(Name of Company)

(Street Address, City, State)

(General Description of Business Activity)

(Your Job Title or Position)

(Name of Company)

(Street Address, City, State)

(General Description of Business Activity)

(Your Job Title or Position)

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STATEMENT OF ECONOMIC INTERESTS
SHORT FORM

FOR DESIGNATED EMPLOYEES

(With no reportable interests or no change from immediate
past filing of Statement of Economic Interests)

See Instruction Manual for Statement of Economic Interests

1. Name: _____
2. Address: _____
3. Department: _____
4. Designated Position: _____
5. Check the appropriate box:
 - ☐ This is my initial statement. (File within 30 days after the effective date of the Conflict of Interest Code.)
 - ☐ I have been appointed to the above-named position and will assume the position on _____. (File 10 days prior to assuming the position.) (date)
 - ☐ I have been transferred to the above-named position and will assume the position on _____. (File within 30 days after assuming the position.) (date)
 - ☐ This is my anniversary statement. (File during the month of _____.)
 - ☐ I left the above-named position as of _____. (File within 30 days of leaving office.) (date)
6. Period covered by the Statement: (Not applicable for initial or appointed Statements)
_____ to _____
7. Check the appropriate box:
 - ☐ There has been no change in my reportable interests since the previous Statement filed by me on _____ (date of filing with your agency). My previous Statement, copy attached, is incorporated into this Statement.
 - ☐ I have no reportable economic interests.

VERIFICATION

I understand that this Statement is filed pursuant to a Conflict of Interest Code and requires that I disclose certain economic interests established by the Code for my position.

I declare under penalty of perjury that I have used all reasonable diligence in preparing this Statement and to the best of my knowledge it is true and complete.

Executed on _____, 19 __, at _____,
California.

(Signature)

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